

# Exhibit A

*Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.*  
 United States District Court for the Southern District  
 Civ. Action No.: 16-cv-9517(LAK)

**Eber Defendants' Amended Privilege Log 9/29/2017 Production**

<u>Bates Number</u>	<u>Date of Document</u>	<u>Type of Document</u>	<u>General Subject Matter</u>	<u>Author(s)</u>	<u>Addressee(s)</u>	<u>Reason Document Withheld From Disclosure</u>
00000713 00000713a-t	11/27/2009	Electronic mail and bank document drafts	Follow up to conversation regarding EBWLC debt	Wendy Eber	Elliot Gumaer, Esq. cc: Lester Eber	Attorney Client Privilege
00000714- 00000728	3/22/2010	Electronic mail and Security Agreement draft	Request to review and comment on bank documents and correspondence	Janet Lissow on behalf of Lester Eber	Elliot Gumaer, Esq. cc: Lester Eber	Attorney Client Privilege
00000729	10/5/2011	Electronic mail	Money Lester Eber loaned to EBWLC	Wendy Eber	Janet Lissow	Attorney Client Privilege
00000729	10/5/2011	Electronic mail	Money Lester Eber loaned to EBWLC	Lester Eber	Wendy Eber cc: Janet Lissow	Attorney Client Privilege
00000729	10/1/2011	Electronic mail	Money Lester Eber loaned to EBWLC	Lester Eber	Wendy Eber	Attorney Client Privilege
00000729	9/30/2011	Electronic mail	Money Lester Eber loaned to EBWLC	Lester Eber	Wendy Eber	Attorney Client Privilege
00000729- 00000731	9/29/2011	Electronic mail	Money Lester Eber loaned to EBWLC	David Belt, Esq.	Lester Eber cc: Russell Green, Esq.	Attorney Client Privilege
00000732- 00000733	9/29/2011- 10/5/2011	Electronic mail	*duplicate of Bates 00000729-00000731	*duplicate of Bates 00000729-00000731	*duplicate of Bates 00000729-00000731	Attorney Client Privilege

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00000734	3/22/2010	Electronic mail	Questions regarding bank loan documents	Wendy Eber	Glenn Sturm, Esq. cc: Lester Eber	Attorney Client Privilege
00000734	2/26/2010	Electronic mail	Forwarding 2/23/2010 electronic mail, below	Wendy Eber	Wendy Eber	Attorney Client Privilege
00000734-00000735	2/23/2010	Electronic mail	Questions regarding loan documents	Steve Park, Esq.	Wendy Eber cc: Will Gaines, Esq. cc: Patty Byrd, Esq. cc: Glenn Sturm, Esq.	Attorney Client Privilege
00000735	2/23/2010	Electronic mail	Questions regarding bank loan documents	Glenn Sturm, Esq.	Steve Park, Esq. cc: Will Gaines, Esq. cc: Patty Byrd, Esq. cc: Wendy Eber	Attorney Client Privilege
00000735	2/23/2010	Electronic mail	Questions regarding bank loan documents	Will Gaines, Esq.	Glenn Sturm, Esq.	Attorney Client Privilege
00000735-00000736	2/22/2010	Electronic mail	Questions regarding bank loan documents	Glenn Sturm, Esq.	Will Gaines, Esq.	Attorney Client Privilege
00000736	2/22/2010	Electronic mail	Questions regarding bank loan documents	Will Gaines, Esq.	Glenn Sturm, Esq.	Attorney Client Privilege

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00000736	2/22/2010	Electronic mail	Questions regarding bank loan documents	Glenn Sturm, Esq.	Will Gaines, Esq. cc: Patty Byrd, Esq. cc: Wendy Eber	Attorney Client Privilege
00000736	2/22/2010	Electronic mail	Questions regarding bank loan documents	Wendy Eber	Patty Byrd, Esq.	Attorney Client Privilege
00000736-00000737	2/22/2010	Electronic mail	Questions regarding bank loan documents	Patty Byrd , Esq.	Wendy Eber	Attorney Client Privilege
00000738	1/19/2012	Electronic mail	Forwarding 1/18/2012 electronic mail, below	Lester Eber	Janet Lissow	Attorney Client Privilege
00000738-00000739	1/18/2012	Electronic mail	Questions regarding bank loan documents	David Belt, Esq.	Lester Eber	Attorney Client Privilege
00000741	3/9/2012	Electronic mail	Confirming telephone conference with Glenn Sturm, Esq. regarding bank relationship issues	Wendy Eber	Elliot Gumaer, Esq. cc: Lester Eber	Attorney Client Privilege
00000741	3/9/2012	Electronic mail	Bank relationship issues	Elliot Gumaer, Esq.	Wendy Eber cc: Lester Eber	Attorney Client Privilege
00017223	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege

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00017372	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege
00017391	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege
00017665	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege
00017666- 00017670	6/7/2016	Settlement Agreement drafts EBWLC / PBGC	Confidential Summary of Key Terms	Bond Schoeneck & King PLLC	Wendy Eber	Attorney Client Privilege
00017687	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege
00017769	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege
00017776	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege
00017818	8/4/2017	Electronic mail	Client forwarding documents to Underberg & Kessler LLP	Wendy Eber	Underberg & Kessler LLP	Attorney Client Privilege



underberg & kessler LLP

PAUL F. KENEALLY, PARTNER  
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April 25, 2018

**VIA E-MAIL AND FIRST CLASS MAIL**

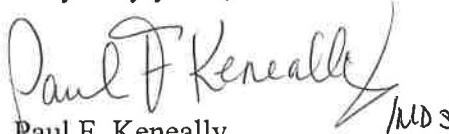
Brian C. Brook, Esq.  
Clinton Brook & Peed  
101 Hudson Street, Suite 2100  
Jersey City, NJ 07302

**RE: Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.**  
**Civ. Action No.: 16-cv-9517**

Dear Mr. Brook:

As per your request, enclosed please find the Eber Defendants' Amended Privilege Log regarding the documents produced on September 29, 2017 in the above-referenced matter.

Very truly yours,

  
Paul F. Keneally /MD 3

PKF/mds  
Enclosure

cc: Colin D. Ramsey, Esq. (w/ enc. via e-mail)  
Donald O'Brien, Esq. (w/ enc. via e-mail and First Class Mail)  
William Bauer, Esq. (w/ enc. via e-mail and First Class Mail)  
Robert Calihan, Esq. (w/ enc. via e-mail and First Class Mail)  
Ms. Aimee Eckner (w/ enc. via e-mail and First Class Mail)  
Laura Myers, Esq. (w/ enc. via e-mail and First Class Mail)  
Michael J. Adams, Esq. (w/ enc. via e-mail and First Class Mail)